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Attorneys for Plaintiff
VERIGY US, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,

Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

Complaint Filed: August 22, 2007
Trial Date: None Set

AND RELATED CROSS-ACTIONS

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. (“Plaintiff”
2 or “Verigy”) requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include: Portions of the Motion for Summary
5 Adjudication of its 3rd and 8th Claims for Relief; Supporting Memorandum of Points and
6 Authorities; Portions of the Declaration of Melinda M. Morton in Support of Verigy’s Motion for
7 Summary Adjudication of its 3rd and 8th Claims for Relief and Exhibits A - D thereto; Exhibit A
8 to the Declaration of Amy Price.

9 These materials (hereafter “the Materials”) disclose information that has been designated
10 as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by the parties under the
11 Protective Order, without objection to those designations (although Verigy reserves its rights to
12 challenge such designations pursuant to the Stipulated Protective Order). Although the
13 information in the Materials has been designated as protected from disclosure under the Protective
14 Order, Verigy must rely on this information in support of its Application. The parties’
15 confidentiality interest therefore overcomes the right of public access to the record, as a substantial
16 probability exists that the parties’ overriding confidentiality interest will be prejudiced if the
17 record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
18 means exist to achieve this overriding interest

19 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
20 Court, and respectfully requests leave to file the aforementioned documents under seal.

21 Respectfully submitted.

22 Dated: August 29, 2008

BERGESON, LLP

23 By: /s/
24 Melinda M. Morton
25 Attorneys for Plaintiff
26 VERIGY US, INC.
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